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**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

E. JEAN CARROLL,

*Plaintiff,*

v.

DONALD J. TRUMP,

*Defendant.*

Civil Action No.: 22-cv-10016

**NOTICE OF DEFENDANT'S  
MOTIONS *IN LIMINE***

**PLEASE TAKE NOTICE** that, the defendant, Donald J. Trump (“Defendant”), hereby moves this Court at the Daniel Patrick Moynihan United States Courthouse, Courtroom 15C, 500 Pearl Street, New York, New York, on such date and at such time as the Court may direct, for an Order *in limine* to: (1) preclude Plaintiff from presenting any evidence relating to Defendant’s purported interactions with non-party witnesses Natasha Stoyanoff and Jessica Leeds; (2) preclude Plaintiff from presenting evidence relating to speeches and statements made by Defendant while he was campaigning for President; (3) preclude Plaintiff from introducing any evidence relating to the “Access Hollywood” tape, including the tape itself; (4) preclude Plaintiff from introducing any evidence relating to emotional damages Plaintiff purports to have sustained as a result of the alleged incident; and (5) preclude Cheryl Lee Beall and Robert Salerno from testifying at trial.

This motion is supported by the annexed Memorandum of Law, including the incorporated Memorandum of Law filed in the action captioned *E. Jean Carroll v. Donald J. Trump, in his personal capacity*, under Civil Case No. 1:20-cv-7311-JAK-JLC (ECF No. 131), Declaration of Alina Habba, Esq. dated February 23, 2023, with exhibits, any arguments or evidence presented hereafter, and all arguments or evidence presented at a hearing or with leave of Court.

Dated: February 23, 2023

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Alina Habba', is written over a horizontal line.

Alina Habba, Esq.

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